



UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

PROJECT VERITAS ACTION FUND,

Plaintiff,

v.

DANIEL F. CONLEY, in his official  
capacity as Suffolk County District  
Attorney,

Defendant.

C.A. No. 1:16-cv-10462-PBS

**PLAINTIFF'S DESIGNATIONS FOR DEFENDANT'S DEPOSITION PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

Pursuant to Federal Rules of Civil Procedure 30(b)(6) plaintiff Project Veritas Action Fund, by and through counsel, makes the following designations in response to Defendant's Notice of Deposition of Plaintiff Project Veritas Action Fund Pursuant to Federal Rule of Civil Procedure 30(b)(6).

1. The organizational structure, corporate form, tax-exempt status, mission, and activities of Project Veritas Action Fund, Inc. ("PVAF") from 2014 through the present.

**DESIGNEE: Russell Verney**

2. The organizational structure, corporate form, tax-exempt status, mission, and activities of Project Veritas, Inc. ("Project Veritas") from 2014 through the present.

**DESIGNEE: Russell Verney**

3. The relationship between PVAF and Project Veritas between 2014 and the present.

**DESIGNEE: Russell Verney**

4. Authentication of, and circumstances concerning the creation and maintenance of, documents produced by PVAF in Project Veritas Action Fund v. Conley, 16-cv-10462 (D. Mass.) (the "Action").

**DESIGNEE: Russell Verney**

5. Facts underlying PVAF's "Initial Disclosures Pursuant to Federal Rule of Civil Procedure 26(a)(1)" in this Action (served Jun. 30, 2017).

**DESIGNEE: Russell Verney**

6. PVAF's anticipated future investigations in Massachusetts, including but not limited to, for each such investigation:

- a. The planning, preparation, goals, and anticipated execution of the investigation;

**DESIGNEE: Robert Halderman**

- b. The anticipated circumstances of the investigation;

**DESIGNEE: Robert Halderman**

- c. The person(s), organization(s), issue(s), and/or thing(s) to be investigated;

**DESIGNEE: Robert Halderman**

- d. The activities and methods anticipated to be used in furtherance of the investigation; and

**DESIGNEE: Robert Halderman**

- e. The anticipated results of the investigation.

**DESIGNEE: Robert Halderman**

7. PVAF's anticipated future recordings in Massachusetts, including but not limited to, for each such recording:

- a. The planning, preparation, goals, and anticipated execution of the recording;

**DESIGNEE: Robert Halderman**

- b. The anticipated circumstances of the recording;

**DESIGNEE: Robert Halderman**

- c. The person(s), organization(s), issue(s), and/or things to be recorded;

**DESIGNEE: Robert Halderman**

- d. The activities and methods anticipated to be used in furtherance of the recording; and

**DESIGNEE: Robert Halderman**

- e. The anticipated results of the recording.

**DESIGNEE: Robert Halderman**

- 8. Each investigation underlying, or resulting in the creation of, any video identified in Topic 9 or Topic No. 10 of this Exhibit A, including but not limited to, for each investigation:

- a. The planning, preparation, goals and execution of the investigation;

**DESIGNEE: Robert Halderman, except as designated below.**

- b. The circumstances of the investigation;

**DESIGNEE: Robert Halderman, except as designated below.**

- c. The person(s), organization(s), issue(s), and/or thing(s) investigated;

**DESIGNEE: Robert Halderman, except as designated below.**

- d. The activities and methods used in furtherance of the investigation; and

**DESIGNEE: Robert Halderman, except as designated below.**

- e. The results of the investigation.

**DESIGNEE: Robert Halderman, except as designated below.**

- 9. The following videos:

- a. "Grimes' campaign workers caught on hidden camera: 'It's a lying game'" posted to YouTube by Project Veritas Action on Oct. 6, 2014, [https://www.youtube.com/watch?v=A1N3rbwRA\\_k](https://www.youtube.com/watch?v=A1N3rbwRA_k) (cited at paragraph 23 of PVAF's Second Amended Complaint (#83) in this Action); and
- b. "Mark Udall Advocates Condone Voter Fraud: 'That's not even like lying or stealing,'" posted to YouTube by Project Veritas Action on Oct. 22, 2014, [https://www.youtube.com/watch?v=C\\_uHDjk3fSc](https://www.youtube.com/watch?v=C_uHDjk3fSc);

including but not limited to, for each video:

- c. Creation of the video;

**DESIGNEE: James O'Keefe**

- d. Production of the video;

**DESIGNEE: James O'Keefe**

- e. Editing of the video;

**DESIGNEE: James O'Keefe**

- f. Dissemination of the video; and

**DESIGNEE: James O'Keefe**

- g. Events, circumstances, things and persons depicted and/or reference in the video.

**DESIGNEE: James O'Keefe**

10. The following videos:

- a. "HIDDEN CAM: Hillary's National Marketing Director Illegal Accepting Foreign Contribution," posted to Youtube by Project Veritas Action on Sept. 1, 2015, <https://www.youtube.com/watch?v=-qxF7Z2N7Y4> (cited at paragraph 24 of PVAf's Second Amended Complaint (#83) in this Action);
- b. "Hidden Cameras Capture Clinton Campaign Staff in Nevada not Only Skirting the Law but Mocking it," posted on Sept. 9, 2015, <http://www.projectveritasaction.com/video/hidden-cameras-capture-clinton-campaign-staff-nevada-not-only-skirting-law-mocking-it> (cited at paragraph 25 of PVAf's Second Amended Complaint (#83) in this Action);
- c. "Out of state voters and non-residents offered ballots in New Hampshire presidential primary," posted to YouTube by Project Veritas Action on Feb. 10, 2016, <https://www.youtube.com/watch?v=DIDgOIdD3BY> (cited at paragraph 26 of PVAf's Second Amended Complaint (#83) in this Action);
- d. "Teachers Union President to Kid: 'I Will Kick Your F\*\*\*ing Ass,'" posted to YouTube by veritasvisuals on Jun. 28, 2016, <https://www.youtube.com/watch?v=YheNaAEPev8;>
- e. "Rigging the Election, Video 1: Clinton Campaign and DNC Incite Violence at Trump Rallies," posted to YouTube by Project Veritas Action on Oct. 17, 2016, <https://www.youtube.com/watch?v=5IuJGHulkzY> (cited at paragraph 27 of PVAf's Second Amended Complaint (#83) in this Action); and



- f. “Part I: Undercover investigation exposes groups plotting criminal activity at Trump inauguration,” posted on Jan. 16, 2017, <http://projectveritas.com/2017/01/16/part-i-hidden-camera-investigation-uncovers-groups-plotting-violence-at-trump-inauguration/> (cited in paragraph 28 of PVAF’s First Amended Complaint (#48) in this Action);

including but not limited to, for each video:

- g. Creation of the video;

**DESIGNEE: Robert Halderman**

- h. Creation of all original, unedited, raw footage contained in the video and identified in the e-mail of Eric Haskell to Stephen Klein dated February 27, 2018 at 5:05 PM[.]

**DESIGNEE: Robert Halderman, except as to portions in 10(c), timestamps 10:10-11:10, 12:19-12:22 and 11:13-12:05, 12:05-12:18, for which James O’Keefe is designated.**

- i. Production of the Raw Footage and/or video;

**DESIGNEE: Robert Halderman**

- j. Editing of the Raw Footage and/or video;

**DESIGNEE: Robert Halderman**

- k. Dissemination of the Raw Footage and/or video; and

**DESIGNEE: Robert Halderman**

- l. Events, circumstances, things and persons depicted and/or reference in the Raw Footage and/or video.

**DESIGNEE: Robert Halderman**

11. Each of the following documents produced by PVAF in this Action:

- a. PVA5\_006;
- b. PVA5\_007;
- c. PVA19\_001; and
- d. PVA20\_001;

Including but not limited to, for each document:

- e. Preparation of the document;

**DESIGNEE: Russell Verney**

- f. Circulation of the document;

**DESIGNEE: Russell Verney**

- g. Implementation of policies, plans and/or proposals reference in the document; and

**DESIGNEE: Russell Verney**

- h. Events, occurrences, circumstances, and things referenced in the document.

**DESIGNEE: Russell Verney**

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/s/ Stephen Klein

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*Counsel for Plaintiff*  
*Project Veritas Action Fund*

March 20, 2018

**CERTIFICATE OF SERVICE**

I, Stephen R. Klein, hereby certify that on this 20th day of March, 2018, the foregoing Designations for Defendant's Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6) was served via electronic mail to Defendant pursuant to mutual agreement by the parties:

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/s/ Stephen Klein

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